REMARKS

This Amendment and Request for Reconsideration is submitted in response to an outstanding final Office Action dated June 2, 2005, the shortened statutory period for response set to expire on September 2, 2005.

I.   Status of the Claims

Please amend claims 1, 2, 3, 5, 6, 9, 10, 13, 14, 16, 17 and 18, and add new claims 19-21 as indicated above. Claims 1-21 are now pending in the application. Claims 1, 5, 9, 13, and 16 are independent claims.

Applicant acknowledges the Examiner's citation of statutory authority as a basis for claim rejections.

II.   Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 1-18 under 35 U.S.C. § 103(a) as being unpatentable over Chi (U.S. Patent No. 6,509,898, "*Chi*") in view of Jordan et al. (U.S. Patent No. 5,745,113, "*Jordan*"). Applicant respectfully traverses the rejection.

Claim 1 as amended recites a method for graphically representing interactions between units of individual persons within an organization, which comprises: determining a connectivity measure for each unit of individual persons; determining a diversity measure for each unit of individual persons; providing a graphical object corresponding to each unit of individual persons; positioning said graphical objects to correspond to the relative positions of the units of individual persons within the organizational hierarchy; varying graphical properties of said graphical objects to correspond to the connectivity measure and the diversity measure; and displaying on a display screen said graphical objects and interactions between the units of individual persons represented by said graphical objects.

Claim 5 as amended recites a method for graphically representing interactions

between individual members within a unit of persons of an organization, which comprises: determining a connectivity measure for each individual member of the unit; determining a diversity measure for each individual member of the unit; providing a graphical object corresponding to each individual member of the unit; positioning said graphical objects to correspond to the relative positions of the individual members within the unit hierarchy; varying graphical properties of said graphical objects to correspond to the connectivity measure and the diversity measure; displaying on a display screen said graphical objects and interactions between the individual members represented by said graphical objects; and displaying on said display screen other related units within the organization.

Claim 9 as amended recites a method for graphically representing interactions between an individual person and other persons within an organization, which comprises: determining a connectivity measure for the interacting individual persons; determining a diversity measure for the interacting individual persons; providing graphical objects corresponding to the interacting individual persons; varying graphical properties of said graphical objects to correspond to the connectivity measure and the diversity measure; displaying on a display screen said graphical objects; and displaying on said display screen direct interactions between the individual persons and indirect interactions between the individual persons to a preselected depth level.

Claim 13 as amended recites a method for graphically representing interactions between hypothetical units of individual persons within an organization, which comprises: determining a connectivity measure for members of actual units within the organization; determining a diversity measure for the members of actual units within the organization; forming the hypothetical units of individual persons based on analysis of interaction data between the members of actual units within the organization; providing a graphical object corresponding to

each hypothetical unit of individual persons; varying graphical properties of said graphical

objects to correspond to the connectivity measures and the diversity measures; and displaying on

a display screen said graphical objects and interactions between the hypothetical units of

individual persons represented by said graphical objects.

Claim 16 as amended recites a method for graphically representing interactions

between individual members of units of persons within an organization, which comprises:

determining a connectivity measure for individual members of units of persons within the

organization; determining a diversity measure for the individual members of units of persons

within the organization; providing graphical objects corresponding to the individual members;

positioning said graphical objects such that the individual members of each unit are clustered

together; varying graphical properties of said graphical objects to correspond to the connectivity

measure and the diversity measure; and displaying on a display screen said graphical objects.

The Examiner states that *Chi* discloses providing a graphical object corresponding

to each unit (Column 7 lines 36-46); positioning said graphical objects to correspond to the

relative positions of the units within the organizational hierarchy (Column 7 lines 36-46); varying

graphical properties of said graphical objects to correspond to pre-selected attributes of the units

(Column 18 lines 18-24); and displaying on a display screen said graphical objects and

interactions between the units represented by said graphical objects (Column 6 lines 18-22).

The Examiner admits that *Chi* fails to disclose the units of an organization being

individual persons and relies on *Jordan*, as teaching organizational hierarchy made of individual

persons (Col. 1, lines 13-21). The Examiner states that it would have been obvious to combine

Chi and *Jordan* with the motivation to help designers to find patterns in relationships and work

practices.

Applicant first submits that regardless of whether *Chi* and *Jordan* disclose what

the Examiner relies on them for, the Examiner's motivation to combine these two references is nothing but hindsight based on Applicant's specification, and there is nothing in the references themselves or elsewhere that would cause a person of ordinary skill to combine them as the Examiner has stated. In short, the Examiner has failed to establish a *prima facie* case of obviousness in view of *Chi* and *Jordan*.

However, in the interest of advancing the application to allowance, Applicant has amended the independent claims and submits that even if the Examiner can establish a proper motivation to combine *Chi* and *Jordan*, neither of the cited references discloses determining a connectivity measure and determining a diversity measure and varying graphical properties of the graphical objects to correspond to the connectivity measure and the diversity measure.

Accordingly, Applicant requests that the anticipation rejection be withdrawn.

III.   Request for Reconsideration

Applicant respectfully submits that the claims of this application are in condition for allowance. Accordingly, reconsideration of the rejection and allowance is requested. If a conference would assist in placing this application in better condition for allowance, the undersigned would appreciate a telephone call at the number indicated.

Respectfully submitted,
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